

STATE OF TENNESSEE

Office of the Attorney General



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Reply to:  
Consumer Advocate and Protection Division  
Post Office Box 20207  
Nashville, TN 37202

May 7, 2004

Honorable Deborah Taylor Tate  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

**IN RE: APPLICATION OF CHATTANOOGA GAS COMPANY, A DIVISION OF  
PIEDMONT NATURAL GAS COMPANY, INC., FOR AN ADJUSTMENT OF ITS  
RATES AND CHARGES, THE APPROVAL OF REVISED TARIFFS AND APPROVAL  
OF REVISED SERVICE REGULATIONS**

**DOCKET NO. 04-00034**

Dear Chairman Tate:

Enclosed is an original and thirteen copies of the Consumer Advocate's Motion to Compel Chattanooga Gas Company in regard to Docket No. 04-00034. Please file same in this docket. Copies are being sent to all parties of record.

Should you have any questions, please contact me at (615) 741-1671. Thank you.

Sincerely,

*Vance L. Broemel*  
Vance Broemel  
Assistant Attorney General

CC: All Parties of Record.

IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

IN RE:

APPLICATION OF CHATTANOOGA )  
GAS COMPANY, A DIVISION OF )  
PIEDMONT NATURAL GAS COMPANY, )  
INC., FOR AN ADJUSTMENT OF ITS )  
RATES AND CHARGES, THE )  
APPROVAL OF REVISED TARIFFS AND )  
APPROVAL OF REVISED SERVICE )  
REGULATIONS )

DOCKET NO. 04-00034

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CONSUMER ADVOCATE'S MOTION TO COMPEL CHATTANOOGA GAS  
COMPANY

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Comes the Consumer Advocate Division of the Office of the Attorney General and hereby files its Motion to Compel with regard to two responses by Chattanooga Gas. The request, response and reason to compel are set forth below.

**DISCOVERY REQUEST NO. 9:**

Provide a reconciliation of "Shared Service Allocation" expense reported on the PSC Forms 3.03 filed with the TRA and forms U-9/C-3 filed with the SEC for the past five years.

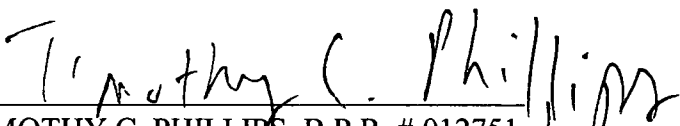
**RESPONSE:**

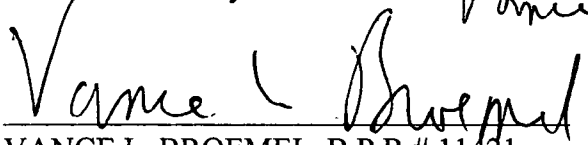
The "Shared Service Allocation" cost is not reported in the SEC Form U-9C-3.

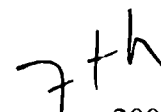
**REASON TO COMPEL:** Despite this request, CGC has failed to reconcile the "Shared Service Allocation" expense reported to the TRA with the affiliate cost allocation reported on SEC form U-9C-3. It is important to know whether this reconciliation can be made because CGC

has allocated shared service costs to ratepayers in its filings but appears to be claiming that the "Shared Service Allocation" cost is not reported in the SEC Form U-9C-3. The Consumer Advocate requests this reconciliation even if the SEC form does not use the precise term "Shared Service Allocation."

RESPECTFULLY SUBMITTED,

  
TIMOTHY C. PHILLIPS, B.P.R. # 012751  
Assistant Attorney General

  
VANCE L. BROEMEL, B.P.R. # 11421  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202  
(615) 741-3533

  
Dated: May 7, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served via the methods indicated on this 7th day of May, 2004, to the following:

Via first-class U.S. mail, postage prepaid:

Dale Grimes  
c/o Dale Grimes  
Bass, Berry & Sims  
AmSouth Center  
315 Deaderick Street, Suite 2700  
Nashville, TN 37238-3001

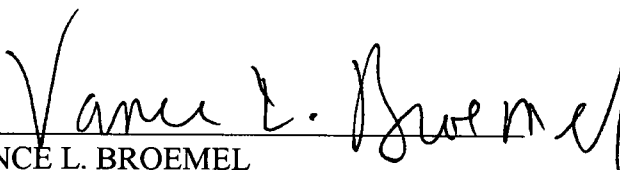
Chattanooga Gas Company  
c/o Archie Hickerson  
AGL Resources, Location 1686  
P.O. Box 4569  
Atlanta, GA 30302-4569

Henry Walker, Esq.  
Boult Cummings, et al.  
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Nashville, TN 37219-8062

Richard Collier, Esq.  
General Counsel  
Tennessee Regulatory Authority  
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Nashville, Tennessee 37243-0505

Via hand delivery:

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Nashville, TN 37219-1760

  
VANCE L. BROEMEL  
Assistant Attorney General